Determination of NEPA Adequacy (DNA)[1]
U.S. Department of the Interior
Bureau of Land Management (BLM)

Office: Alaska State Office
Tracking Number: DOI-BLM-AK-0000-2020-0001-DNA
Casefile/Project Number: AA095503
Proposed Action Title/Type: Oil and Gas Lease Sale in the National Petroleum Reserve-Alaska
Location/Legal Description: National Petroleum Reserve in Alaska on Alaska's North Slope

A. Description of the Proposed Action and any applicable mitigation measures

To offer for lease a total of 350 tracts encompassing about 3.97 million acres within the approximate 11.6 million acres that have been authorized for leasing by the Secretary of the Interior in the 2013 Record of Decision (ROD). Currently there are 215 authorized oil and gas leases totaling 1,558,396 acres in the NPR-A. Approximately 11 million acres, including roughly 3.1 million acres within the Teshekpuk Lake Special Area, are not available for oil and gas leasing under the 2013 ROD and are not being offered in this lease sale.

Best Management Practices (BMPs) and lease stipulations were adopted in the 2013 ROD to ensure that oil and gas operations are conducted in a manner that minimizes adverse impacts to the land, resources, land uses, and users. BMPs and lease stipulations (see Appendix A of the 2013 ROD) will be incorporated into the lease terms associated with the proposed action.

Since 2011, under a presidential directive, BLM Alaska has held annual NPR-A oil and gas lease sales. The NPR-A Integrated Activity Plan/Final Environmental Impact Statement (IAP/FEIS), signed February 21, 2013, authorizes multiple oil and gas lease sales for those areas in the NPR-A that the ROD makes available for leasing. The bid opening for the 2019 NPR-A oil and gas lease sale is scheduled for December 2019.

B. Land Use Plan (LUP) Conformance

LUP Name:

- National Petroleum Reserve in Alaska Integrated Activity Plan/Environmental Impact Statement (2012) and Record of Decision (2013)
- Colville River Special Area Management Plan and associated Environmental Assessment, and Decision Record (July 2008) and the September 2013 update.

Date Approved:

- December 19, 2012 (NPR-A IAP/FEIS) and February 21, 2013 (ROD)
- July 2008 (Colville River Special Area Management Plan and Environmental Assessment); September 27, 2013 (Colville River Special Area Management Plan update)

The proposed action is in conformance with the applicable Integrated Activity Plan and associated ROD and Decision Record, which provide the basis for BLM's current management of the NPR-A.

[1] Prepared in accordance with 43 C.F.R. § 46.120(c) and § 5.1 of the BLM NEPA Handbook (H-1790-1).

C. Identify applicable National Environmental Policy Act (NEPA) documents and other related documents that cover the proposed action

- NPR-A IAP/FEIS (December 2012) and ROD (February 2013)
- Colville River Special Area Management Plan and Environmental Assessment, and Decision Record (July 2008); September 27, 2013 (Colville River Special Area Management Plan update)

D. NEPA Adequacy Criteria

1. a. Is the new proposed action a feature of, or essentially similar to, an alternative analyzed in the existing NEPA document?
Yes. The current proposal is part of the preferred alternative previously analyzed in the 2012 NPR-A IAP/FEIS and adopted in the 2013 ROD. The ROD authorizes multiple oil and gas lease sales for lands BLM is offering in the 2019 lease sale.[2] This proposed lease sale is the seventh within NPR-A under the 2013 ROD.

1. b. Is the project within the same analysis area, or if the project location is different, are the geographic and resource conditions sufficiently similar to those analyzed in the existing NEPA document? If there are any differences, can you explain why they are not substantial?

Yes. The proposed lease sale is within the area open to leasing and analyzed in Alternative B-2 of the 2012 NPR-A IAP/FEIS, which was adopted in the 2013 ROD.

2. Is the range of alternatives analyzed in the existing NEPA document(s) appropriate with respect to the current proposed action, given current environmental concerns, interests, and resource values?

Yes. The 2012 NPR-A IAP/FEIS analyzed a broad range of alternatives for the entire NPR-A planning area, including alternatives that closed various areas to leasing. The alternatives included a wide range of lease stipulations and BMPs to protect surface resources and uses and address a wide variety of environmental concerns, interests, and resource values. The broad range of alternatives analyzed in the 2012 NPR-A IAP/FEIS remains appropriate in consideration of current environmental concerns, interests, and resources values, which remain essentially the same as analyzed in the 2012 NPR-A IAP/FEIS.

3. Is the existing analysis valid in light of any new information or circumstances (such as, rangeland health standard assessment, recent endangered species listings, and updated lists of BLM-Sensitive species)? Can you reasonably conclude that new information and

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[2] See Final IAP/EIS, Vol. I, at p. 9:
The decision regarding oil and gas leasing resulting from this plan may authorize multiple lease sales. The first lease sale based upon this plan and associated record of decision most likely would occur in 2013, with subsequent annual lease sales. The BLM anticipates that this IAP/EIS will fulfill the NEPA requirements for the first oil and gas lease sale and for any potential renegotiations of the stipulations of previously leased tracts in the planning area. Prior to conducting each additional sale, the agency would conduct a determination of the existing NEPA documentation's adequacy. If the BLM finds its existing analysis to be adequate for a second or subsequent sale, the NEPA analysis for such sales may require only an administrative determination of NEPA adequacy.

new circumstances would not substantially change the analysis of the new proposed action?

Yes, and yes. As discussed below, the existing analysis and conclusions, as provided for within the 2012 NPR-A IAP/FEIS, are adequate in light of new information and circumstances, which would not substantially change the analysis of potential impacts resulting from the 2019 lease sale.

Recent Discoveries and USGS Assessment of Oil and Gas Resources in Nanushuk and Torok Formations

On December 22, 2017, the U.S. Geological Survey (USGS) published an *Assessment of Undiscovered Oil and* Gas *Resources in the Cretaceous Nanushuk and Torok Formations, Alaska North Slope, and Summary of Resource Potential of the National Petroleum Reserve in Alaska, 2017,* which addressed recently announced oil and gas discoveries in and near the NPR-A within the Nanushuk and Torok geologic formations and substantially revised upward its estimate of mean undiscovered, technically recoverable oil resources for those formations as compared to assessments it undertook for the Central North Slope Region in 2005 and for the NPR-A and adjacent State offshore waters in 2010. The new USGS report estimates 8.7 billion barrels of mean undiscovered, technically recoverable oil and 25 trillion cubic feet of mean undiscovered, technically recoverable natural gas. This undiscovered oil estimate is substantially higher than a cited 1.5-billion-barrel estimate for the study area that USGS discerned from its 2005 and 2010 assessments (i.e., an almost six-fold increase for these formations), owing primarily to recent, larger than anticipated oil discoveries in these formations.[3]

Given that the impact analysis in the 2012 NPR-A IAP/FEIS is in part based on a hypothetical reasonably foreseeable development scenario that is based on the amount of undiscovered economically recoverable oil and gas that might be discovered and produced as a result of BLM's NPR-A leasing and development program, the higher estimate of undiscovered technically recoverable oil presented in the 2017 USGS assessment for the Nanushuk and Torok formations raises the question as to whether the 2017 assessment and the recent discoveries addressed therein present new information which may substantially change the analysis of impacts of the NPR-A leasing and development presented in the 2012 NPR-A IAP/FEIS. However, as discussed below, the nature of the 2017 USGS oil and gas assessment substantially differs in important aspects from prior USGS assessments and is therefore of limited utility in discerning what impact it and the recent discoveries may have, if any, on the 2012 NPR-A IAP/FEIS's estimates of undiscovered economically recoverable oil and gas that were a basis of the hypothetical reasonably foreseeable development scenario and associated impact analysis contained in the 2012 NPR-A IAP/FEIS. Furthermore, the amount of oil and gas exploration and development to date in the NPR-A since completion of the 2012 NPR-A IAP/FEIS is only a very small fraction of the total amount of such activity estimated and analyzed as part of the 2012 NPR-A IAP/FEIS's hypothetical development scenario.

The hypothetical development scenario in the 2012 NPR-A IAP/FEIS is based on the estimated amount of *economically* recoverable undiscovered oil and gas resources, whereas the 2017 assessment only addresses the estimated amount of *technically* recoverable undiscovered oil

[3] USGS did not report the amount of change in the estimated amount of mean undiscovered, technically recoverable natural gas in the Nanushuk and Torok formations comprising the study area.

and gas resources. In this regard, the 2012 NPR-A IAP/FEIS assumed that approximately 604 million barrels of economically recoverable undiscovered oil in the NPR-A would ultimately be discovered and produced, along with 16.45 trillion cubic feet of undiscovered economically recoverable natural gas.[4] These amounts were based on a 2011 USGS economic analysis of its 2010 resource assessment for NPR-A.[5] USGS has no plan to conduct a similar economic analysis of its 2017 assessment. Moreover, the difference between the estimated amount of technically recoverable undiscovered oil and gas resources and the lesser, estimated amount of economically recoverable undiscovered oil and gas resources can vary tremendously. In fact, under certain economic scenarios it is possible that an estimate of economically recoverable undiscovered oil and gas resources stemming from a high estimate of technically recoverable undiscovered oil and gas can reach or approach zero when downwardly adjusted for real-world economic assumptions such as the high cost to explore and develop resources in the NPR-A and relatively low market prices for oil and gas. Therefore, it is unreasonable and illogical to compare technically recoverable oil and gas resource estimates to estimates of economically recoverable oil and gas.

It is also important to note that USGS's 2017 assessment involves a large area of land and offshore waters that only partially overlaps with the study area USGS used for its 2010 NPR-A technically recoverable resource assessment and 2011 economic analysis thereof. In this regard the 2010 assessment and 2011 analysis evaluated a study area comprised of all of NPR-A and some State offshore waters located in the Beaufort Sea north of the NPR-A, whereas the 2017 assessment only evaluates the Nanushuk and Torok formations on the North Slope, which comprise only a portion of the 2010 and 2011 NPR-A study area, but also includes a large area of State and Native-owned land outside NPR-A in the Central North Slope Region which was the subject of a separate 2005 assessment. This geographic difference in the respective study areas presents a second instance of an unreasonable and illogical comparison, and thus compounds the problem presented by the technically vs. economically recoverable estimates distinction discussed in the paragraph above.

Additionally, USGS assessments can be highly variable and qualitative. USGS has repeatedly revised its prior assessments of producible oil and gas for the NPR-A and surrounding areas, as new information has become available and additional analysis has been conducted. These assessments have proven to fluctuate significantly over time, as evidenced by the fact that the assessments of technically recoverable reserves for NPR-A and surrounding areas were projected by USGS to be 10.5 billion barrels of oil and 61 trillion cubic feet of gas in 2002, then were revised for that same study area in 2010 to be only 896 million barrels of oil and 53 trillion cubic feet of gas. The 2017 assessment further lowers the amount of undiscovered technically recoverable natural gas in the general region, while seemingly increasing the amount of undiscovered technically recoverable oil in its new study area to an amount somewhere in between the amounts estimated in 2002 and 2010. Furthermore, some topset or shallow production discoveries that were accountable for the increase in reserve estimates in the 2017 assessment were actually part of the Bear Tooth Unit oil discovery that was not included in the 2010 NPR-A assessment because the data was proprietary and withheld by the company for use in the that assessment. Nonetheless, BLM accounted for this development under the reasonably foreseeable development scenario for all alternatives evaluated in the IAP/EIS.

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[4] *See* Final IAP/EIS, Vol. 2, at 56-63.

[5] USGS's economic analyses of technically recoverable oil and gas assessments estimate how much of the technically recoverable oil and gas is likely to be discovered and produced under certain economic assumptions, including various market prices for oil and natural gas.

Moreover, evaluation of the potential significance of each of the recent discoveries, independent of USGS's 2017 assessment, reveals little or no bearing on the analysis of potential impacts resulting from leasing and development with the NPR-A described and analyzed in the 2012 NPR-A IAP/FEIS.

Of the four recent discoveries addressed in USGS's 2017 assessment, only the Willow prospect, announced by ConocoPhillips in 2017, is located within NPR-A and thus directly relates to the impact analysis contained in the 2012 NPR-A IAP/FEIS. Of the four announced discoveries, Willow is by far the smallest. The reserves for Willow were initially estimated at 300 million barrels of oil, but in April 2018 were upgraded to 400 million barrels of oil equivalent, which is a unit of energy equivalent to a barrel of crude oil. It essentially combines oil and gas reserves. Technically, this revised estimate does not change the initial reserves as much as the new number now accounts for hydrocarbons outside of crude oil. It is also important to note at this time there is no market for the gas.

Furthermore, the NPR-A IAP/FEIS fully accounts for the Willow prospect, which was formerly part of the Greater Moose's Tooth (GMT) Unit, encompassing the western portion of that exploratory unit, but is now completely within the Bear Tooth Unit based on a unit boundary adjustment that took place in 2018. Both of these units were already established in NPR-A when the 2012 NPR-A IAP/FEIS was completed, and thus the analysis accounted for this potential discovery. In this regard, the discovery is a validation of a notional participating area or oil reservoir that is included within the 2012 NPR-A IAP/FEIS for the GMT unit. Moreover, the size of the discovery and the resulting amount of oil and gas infrastructure and activity that is likely required to develop it are very much in line with the amount of infrastructure and activity the 2012 NPR-A IAP/FEIS indicated would be necessary to develop such a discovery (i.e., a new central processing facility and a small number of satellite drill pads with connecting pipelines and gravel roads).

The combined Pikka (2015) and Horseshoe (2017) discoveries announced by Armstrong Oil and Gas, now understood to likely involve the same geologic feature and thought to contain as much as approximately 1.0 billion barrels of oil, are located outside and to the east of the NPR-A on nonfederal lands. Efforts from industry continue to concentrate on reservoir delineation in the northeast portion of the Pikka Unit on nonfederal lands. Geologic information available at this time suggests these units are not likely to result in any development wells or unit extension proposals within the NPR-A. The Stoney Hill exploration well was drilled within this portion of the NPR-A during the 2017 winter season, but was promptly plugged and abandoned. The BLM has not received any new applications for permits to drill, nor any unit applications relating to this area. Any future development of the Pikka Unit including pipelines and roads, would likely be routed eastward away from the NPR-A and back through the Kuparuk unit on state lands without interaction on federally managed lands. The reservoir is projected to be linear in nature trending north-south and has not been identified as extending across the NPR-A boundary into federal lands.

Smith Bay is located outside the boundary of the NPR-A in State waters within the Beaufort Sea. Caelus drilled two exploration wells during the winter of 2015 on state offshore leases in Smith Bay and in 2016 announced a potential discovery of approximately 6.0 billion barrels of oil. However, that discovery is unsubstantiated given that the wells were not flow-tested, as ordinarily is common industry practice prior to announcing a discovery, and the fact that there have been no additional delineation wells drilled. Further, Caelus estimated only 30-40% of the oil is technically recoverable based on characteristics of the oil and the reservoir. No further activity has occurred regarding this prospect since 2015. The BLM has always known of oil within this region as three federal leases within NPR-A near Smith Bay have been held by

discovery since they were drilled in 2006. The 2012 NPR-A IAP/FEIS made all the potential federal leases near Smith Bay that could be associated with the development of this structure unavailable for leasing, thus no new wells or production impacts are anticipated within NPR-A from this discovery. The amount of leases or acreage that could possibly be committed to an exploratory unit to potentially develop this prospect is unknown. The 2012 NPR-A IAP/FEIS acknowledged this prospect in State waters and analyzed a potential pipeline route from this area back to Alpine through the NPR-A (2012 NPR-A IAP/FEIS Figures 4-9 and 4-10). The 2012 NPR-A IAP/FEIS does not afford BLM an opportunity to lease or explore any adjacent lands that could be tied to this prospect. This prospect will not have an effect on impacts from well exploration and production from federal leases within the NPR-A.

Although the Smith Bay and Pikka-Horseshoe discoveries are not likely to impact the analysis of leasing and development in the NPR-A under the 2012 NPR-A IAP/FEIS, if ultimately proved up and developed they have some potential to cumulatively combine with effects from leasing and development within the NPR-A. However, the 2012 NPR-A IAP/FEIS presumed that further exploration would take place in these areas outside NPR-A, and that such exploration presented a reasonable chance of leading to discoveries and development. In this regard, the cumulative effects analysis in the 2012 NPR-A IAP/FEIS already anticipated such discoveries in these general areas and accounted for their potential cumulative impacts.

Umiat is a known hydrocarbon area with a technically recoverable oil estimate of roughly 70-300 million barrels, based upon exploration efforts by the U.S. Navy, USGS and industry. On September 1, 2019 the BLM approved an exploration unit in the Umiat area encompassing two leases. All requirements and obligations under 43 CFR 3137 would be met in order to maintain the Unit for future development. It is anticipated that at least one delineation well will be drilled within the next three years. Unitization and potential development of the Umiat discovery was accounted for and analyzed in 2012 NPR-A IAP/FEIS which discusses development at Umiat with pipeline and road access likely joining infrastructure to the north or connecting east to the Dalton Highway.

Furthermore, in order to address uncertainties inherent in attempting to predict where and how much future leasing, exploration, discoveries and development may occur, Section 4.2 of the 2012 NPR-A IAP/FEIS made several reasonable assumptions to minimize the chance that the resultant impact analysis will understate potential impacts:

- BLM based its analysis of economically recoverable oil and gas from the NPR-A on a $180 per barrel price of oil, representing the high end of USGS's price range projections in its 2011 economic analysis. The BLM adopted this high-end estimate of the price of oil because it did not want to underestimate the potential development that may occur as an indirect result of its decision to offer oil and gas leases in the NPR-A, and because it determined that erring on the high side was prudent to account for the potential long-term ramifications of the decisions that could result from the IAP/EIS.

- The amount of infrastructure necessary to develop the projected oil or gas within Section 4.2 is estimated at upper, but reasonable, limits. The estimated footprint associated with the oil and gas development was set conservatively high so it wouldn't underestimate undiscovered resources. Thus far, the amount of actual and proposed development in the NPR-A is a very small fraction of the amount of overall development assumed in the 2012 NPR-A IAP/FEIS.

- The development scenario assumes that multiple lease sales would be held, on an annual basis according to presidential order.

- It was assumed that industry would aggressively lease and explore the tracts offered.

In sum, the new information presented by the USGS report and new discoveries do not appreciably affect the impacts analysis in the 2012 NPR-A IAP/FEIS, which already erred on the conservative side and over analyzed likely potential impacts.

For these reasons, the recent USGS assessment and recent discoveries do not constitute significant new information, and would not substantially change the analysis of potential impacts resulting from NPR-A leasing and development as described and analyzed in the 2012 NPR-A IAP/FEIS.

Leases Issued Under 2016 NPR-A Lease Sale & Total Amount of Leased Land

During the 2016 lease sale BLM received bids on 67 tracts totaling 613,528 acres, and , after one bid was abandoned, issued leases for 66 of those tracts totaling 602,139 acres. This was the highest amount of acreage leased as a result of an NPR-A lease sale since the 2013 ROD was adopted and was more than twice the acreage under the next most successful lease sale in 2013 sale, which resulted in 245,293 acres being leased. However, the 2012 NPR-A IAP/FEIS anticipated and accounts for this potential level of leasing, particularly in the Northeastern area of the NPR-A, where the 66 leased tracts resulting from the 2016 sale are located and the highest development potential exists. For purposes of impact analysis, the 2012 NPR-A IAP/FEIS assumed that all of the approximately 11.6 million acres of land available for leasing under the 2013 ROD would be offered for lease in one or more sales (see 2012 NPR-A IAP/FEIS § 1.7), and thus that all 11.6 million acres could in fact be leased. Moreover, of the 66 tracts leased as a result of the 2016 lease sale, 34 tracts were leased at the time the 2012 NPR-A IAP/FEIS was issued but were subsequently relinquished or allowed to expire. For these reasons, the relatively large amount of acreage leased as a result of the 2016 sale (602,139 acres), and the current total amount of leased acreage in the NPR-A (1,558,396 acres), which is only approximately 13.4% of the total land available for leasing, do not constitute significant new information, and would not change the analysis of potential impacts resulting from NPR-A leasing and development as described and analyzed in the 2012 NPR-A IAP/FEIS.

GMT1 Subsistence Determination

BLM's Final Supplemental EIS for the Greater Mooses Tooth One (GMT1) oil and gas development in NPR-A (October 2014) concluded that the project may cause a significant restriction to subsistence use of lands in the NPR-A for the residents of Nuiqsut, a village located near the proposed project. That conclusion contrasts with the 2012 NPR-A IAP/FEIS which found that BLM's implementation of the IAP was not likely to significantly restrict subsistence use.

However, the GMT1-related subsistence impact determination involved a unique risk to subsistence use because the proposed project was to be located partially within the Fish Creek Setback, a critical subsistence use area for residents of Nuiqsut. The Fish Creek Setback is a 3-mile buffer along Fish Creek adopted under the 2012 NPR-A IAP/FEIS to protect subsistence use, within which permanent oil and gas facilities are generally prohibited under the IAP/EIS. Exercising its discretion as allowed by the IAP/EIS, in its GMT1 ROD BLM approved an exception to the prohibition against permanent oil and gas facilities being constructed in the setback, in exchange for a $7,000,000 payment from the project proponent to support compensatory mitigation projects aimed at offsetting the adverse impacts to subsistence

resulting from constructing within the setback. BLM's conclusion that the proposed project may significantly restrict subsistence use did not take into account the beneficial offsetting effects from the compensatory mitigation projects to be funded by the $7,000,000 payment, which are intended to reduce the adverse impacts to subsistence to a less than significant level. When one accounts for the unique circumstances presented by the GMT1 project and the reduced level of impact to subsistence use expected to result from the compensatory mitigation projects, the GMT1 subsistence impact determination is consistent with the determination in the 2012 NPR-A IAP/FEIS that BLM's overall implementation of the IAP is not likely to significantly restrict subsistence use. For these reasons, the GMT1-related subsistence impact determination does not constitute significant new information, and would not substantially change the analysis of potential subsistence impacts resulting from NPR-A leasing and development as described and analyzed in the 2012 NPR-A IAP/FEIS.

Implementation of an ANWR Coastal Plain Oil and Gas Leasing Program

In Section 20001 of the Tax Cuts and Jobs Act of 2017, PL 115-97 (December 22, 2017), Congress directed BLM to implement an oil and gas leasing program for the Coastal Plain area within the Arctic National Wildlife Refuge (ANWR). On September 20, 2019, BLM published a Final EIS analyzing the impacts of implementing such a program in the Coastal Plain. Given the large distance separating NPR-A and the ANWR Coastal Plain, and the Coastal Plain's location to the east of NPR-A and all other established oil and gas infrastructure on the North Slope of Alaska, very few if any effects from the Coastal Plain program are expected to accumulate with impacts of oil and gas exploration and development activities in NPR-A as analyzed in the 2012 NPR-A IAP/FEIS, including its cumulative impacts analysis. To the limited extent such cumulative impacts may occur, they are addressed in the cumulative effects analysis of the September 2019 Coastal Plain Oil and Gas Leasing Final EIS. No lands in the NPR-A would support development of the Coastal Plain, including lands used for roads or pipelines to access the Coastal Plain and its oil and gas resources. For these reasons, implementation of the Coastal Plain oil and gas leasing program does not constitute significant new information, and would not substantially change the analysis of potential impacts, including cumulative impacts, resulting from NPR-A leasing and development as described and analyzed in the 2012 NPR-A IAP/FEIS.

4. Are the direct, indirect, and cumulative effects that would result from implementation of the new proposed action similar (both quantitatively and qualitatively) to those analyzed in existing NEPA documents?

Yes. The direct, indirect, and cumulative impacts of this proposed action are similar and essentially unchanged from those identified in the multiple sale analysis in the 2012 NPR-A IAP/FEIS. BLM's monitoring of activities in the NPR-A since the completion of the 2012 NPR-A IAP/FEIS indicates that impacts are less than or consistent with those that were anticipated and analyzed in the 2012 NPR-A IAP/FEIS. The IAP/EIS sufficiently analyzes both the type of impacts and the magnitude of impacts associated with the 2019 lease sale.

None of the new discovery information will have a direct impact to the resource analysis. The Smith Bay discovery is unproven and has not been quantified. Even if Smith Bay were proven and economically viable to develop, it and the Pikka-Horseshoe discoveries outside of NPR-A do not have any meaningful direct relation to the development potential and associated impacts of those NPR-A lease tracts that are available for lease under the 2012 NPR-A IAP/FEIS and 2013 ROD. Further, any indirect or cumulative resource impacts associated with the Smith Bay and Pikka-Horseshoe discoveries are consistent with the cumulative effects analysis in the 2012 NPR-A

IAP/FEIS, which foresaw and took into account potential discoveries in those areas. The Willow discovery was already been anticipated and accounted for in the 2012 NPR-A IAP/FEIS analysis.

This is an exploratory lease area and therefore there are no current production or wells capable of production on the proposed offered tracts. Oil production probability for the northeast portion of the NPR-A has always been projected to be greater than the remainder of the NPR-A. Areas to the south and west are prone to natural gas production that is largely known and not economically viable at this time.

Air pollutant emission impacts and greenhouse gas impacts are similar and unchanged from the discussion and analysis found in the 2012 NPR-A IAP/FEIS. Any related direct and indirect air pollutant impacts and greenhouse gas emissions related to exploratory wells and potential development on any parcels offered in this sale has been discussed and sufficiently analyzed in the 2012 NPR-A IAP/FEIS.

The BLM has carefully reviewed the IAP/EIS in preparation of this sale and determined that its analysis of potential impacts still reflects the best available information. With respect to climate change, the IAP/EIS contains a robust qualitative discussion of potential impacts. Further, the recent draft EIS for the Willow Master Development Plan (August 2019) and the Final Coastal Plain Leasing EIS (September 2019) provide additional, quantitative analysis of potential greenhouse gas emissions from oil and gas leasing and development on the North Slope, including in NPR-A, and are consistent with the qualitative analysis of such impacts contained in the 2012 NPR-A IAP/FEIS. The BLM has reviewed the 2012 NPR-A IAP/FEIS analysis and determined it remains relevant to and adequate for the proposed lease sale.

5. Are the public involvement and interagency review associated with existing NEPA document(s) adequate for the current proposed action?

Yes. The 2012 NPR-A IAP/FEIS involved extensive public participation and specifically addressed the intention to hold multiple oil and gas lease sales for areas made available for leasing under the 2013 ROD, including the areas offered for leasing in the 2019 lease sale. BLM also issued a Federal Register notice pertaining to the 2019 lease sale on June 20, 2019 in which BLM solicited comments from the public.

Conclusion[6]

Based on the review documented above, I conclude that this proposal conforms to the applicable land use plans and that the existing NEPA documentation fully and adequately covers the proposed action and constitutes BLM's compliance with the requirements of NEPA. No supplemental NEPA analysis is required.

10/24/19

Prepared by Rob Brumbaugh, Chief, Fluid Minerals Section Date

10/24/19

Chad Padgett, Alaska State Director Date

[6] Note: The signed Conclusion on this Worksheet is part of an interim step in the BLM's internal decision process and does not constitute an appealable decision.